

# EXHIBIT 2

**From:** Park, Ryuk <RPark@winston.com>  
**Sent:** Friday, September 8, 2023 5:25 PM  
**To:** Zhao, Yanan; Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; Wesley Hill  
**Cc:** #Netlist-Micron [Int]; Jennifer Truelove (jtruelove@McKoolSmith.com)  
**Subject:** RE: Netlist v. Micron, No. 22-cv-203 (EDTX) | meet and confer

Yanan,

1. **Netlist's proposal to extend deadline for damages report and HBM-related expert report by 2 weeks**
  1. Micron does not believe there is enough time in the schedule for a 2-week extension to opening reports.
  2. Micron proposes extending all expert related deadlines for both sides by 3 days instead.
2. **ESI for Mr. Beal and Mr. Royer**
  1. Due to Nest's extremely late ESI requests and unreasonable breadth of search terms, we anticipate completing review of Mr. Royer's emails by Monday-Tuesday timeframe, and Mr. Beal's emails by Tuesday-Wednesday next week. We will produce emails as soon as review is completed.
3. **License agreement**
  1. The additional license agreements are being processed for production. We expect our discovery vendor to have the production ready by Monday.
4. **Product samples**
  1. We will provide updates on the ETA for samples by end of next week.
5. **Source code materials**
  1. Remaining source code printouts, including printouts of documents made available yesterday, were sent out earlier today.
  2. Our discovery vendor is processing the redacted documents.
6. **Netlist's proposed use of Renesas deposition transcript from the Netlist/Samsung case**
  1. We are still reviewing and provide Micron's response on Monday.

Ryuk

#### Ryuk Park

##### Of Counsel

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**WINSTON  
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LLP

**From:** Zhao, Yanan <yzhao@irell.com>  
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**Cc:** #Netlist-Micron [Int] <Netlist-Micron@irell.com>; Jennifer Truelove (jtruelove@McKoolSmith.com) <jtruelove@McKoolSmith.com>  
**Subject:** RE: Netlist v. Micron, No. 22-cv-203 (EDTX) | meet and confer

That's fine with us. Can Micron also let us know your position today at least with respect to: (1) Netlist's motion to extend the expert reports deadline and (2) Renesas deposition designations?

Best,

**Yanan Zhao**

*Associate*

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**From:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>  
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**Subject:** RE: Netlist v. Micron, No. 22-cv-203 (EDTX) | meet and confer



[illegible]

- (5) The above-referenced compromise is based on the understanding that Micron does not intend to bring any of these witnesses to trial, designate them as 30(b)(6) corporate representatives, or have Micron experts rely on their input.

Best,  
Yanan

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